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LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
REVIEW OF SITE ASSESSMENT REPORT ADDENDUM III FOR UNDERGROUND
STORAGE TANK SITE 22, INSTALLATION RESTORATION SITE 21 NAS PENSACOLA FL
08/19/2011
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

August 19, 2011

Ms. Patty Marajh-Whittemore
Remedial Project Manager
ITP Gulf Coast
Naval Facilities Engineering Command Southeast
Attn: AJAX Street, Building 135N
P.O. Box 30A
Jacksonville, FL 32212-0030

RE: Site Assessment Report Addendum III for Underground Storage Tank Site 22 (IR Site 21), Naval Air Station Pensacola, Pensacola, Florida.

Dear Patty:

The Department has reviewed the Response to FDEP Comments dated November 29, 2010 and Revision 2 to the Site Assessment Report Addendum III for Underground Storage Tank Site 22 (IR Site 21), Naval Air Station Pensacola, dated March 2011 (both received by e-mail on April 18, 2011), prepared and submitted by Tetra Tech NUS, Inc. The Response to FDEP Comments letter appears to adequately address my previous comments on the Site Assessment Report Addendum III with an agreement that the Navy may propose to conduct the additional assessment I requested in comment (6) proposal (4) as part of a Monitored Natural Attenuation Plan/Remedial Action Plan as agreed to in the UST Site 22 (IR Site 21) Teleconference of January 13, 2011. However, the agreed to recommendations for progressing with site cleanup do not seem to be adequately conveyed in Revision 2 of the Site Assessment Report Addendum III. Monitoring only is identified as the preferred method for addressing the lead contamination detected on site even though concentrations of lead in groundwater in several monitoring wells and DPT groundwater sampling locations nearest to Pensacola Bay were above surface water criteria. There was no mention of further groundwater monitoring wells being necessary to delineate the plumes in all directions, both horizontally and vertically, as part of the RAP. There was also no mention of an evaluation of the seawall being used as an engineering control keeping contaminated groundwater from discharging to Pensacola Bay. Lastly, the conclusion that there is not a continuing source because there is not a pattern to the lead exceedances would seem to be in error as clearly lead is only an issue in wells located on the eastern part of the

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site and not on the western part of the the site and the lead seems to originate from where two aboveground storage tanks were located north of Radford Boulevard. A case might be made that there is no continuing source if soil analytical data collected from the vicinity of the aforementioned aboveground storage tanks shows that lead concentrations in soil are low and not leaching to groundwater so as to create groundwater contamination.

If you have any questions regarding this letter, please contact me at (850) 245-8997.

Sincerely,



David P. Grabka, P.G.
Remedial Project Manager
Federal Programs Section
Bureau of Waste Cleanup

CC: Gerald Walker, TtNUS, Tallahassee
Greg Campbell, NAS Pensacola
Sam Naik, CH2M Hill, Atlanta

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